

Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DALLAS BUYERS CLUB, LLC,

Plaintiff,

v.

DOES 1-10,

Defendants.

Civil Action No. 2:14-cv-1336

STIPULATED PERMANENT  
INJUNCTION AND DISMISSAL OF  
DOE 4NOTE ON MOTION CALENDAR:  
October 31, 2014

As attested to by the signatures below, this matter comes before the Court on the parties' joint stipulation. On August 28, 2014, Plaintiff Dallas Buyers Club, LLC filed this action against various Doe defendants in the United States District Court for the Western District of Washington, Case No. 2:14-cv-1336, for copyright infringement, 17 U.S.C. §§ 101, et seq. (Dkt. No. 1), resulting from the illegal copying and distribution of Plaintiff's motion picture entitled *Dallas Buyers Club*, registered with the United States Copyright Office, Registration No. PA 1-873-195.

Defendant has been identified as Doe 4 in the complaint by the Internet Protocol address of 67.170.91.211 on 5/24/14 at 06:17:25 AM ("Defendant" herein refers solely to Doe 4). Defendant has since been identified by name and address to Plaintiff's counsel in this case, but wishes to remain anonymous for purposes related to this case. Accordingly, pursuant to a Confidential Settlement Agreement between the parties whereby Defendant expressly agreed to the terms of this stipulation and

1 authorized Defendant's attorneys to enter into it on behalf of their client, Plaintiff has agreed to  
2 maintain the identity of Defendant confidential, unless disclosure is otherwise required by law.

3 To fully and finally resolve all claims between the parties and the matters before the Court, the  
4 parties have reached a settlement whereby Defendant agrees without admission of fault or liability to  
5 entry of this stipulation, and the parties to dismissal with prejudice of Plaintiff's claims pursuant to the  
6 terms of the Confidential Settlement Agreement.

7 WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to  
8 this case between the parties, as follows:

9 1. This Court has jurisdiction over the parties and venue is proper.

10 2. Plaintiff has valid and enforceable rights in the original copyrighted work *Dallas*  
11 *Buyers Club*, registered with the United States Copyright Office under Registration  
12 No. PA 1-873-195

13 3. Defendant was assigned the Internet Protocol address 67.170.91.211 on 5/24/14 at  
14 06:17:25 AM and, as such, is a proper named defendant in this action.

15 4. Defendant does not dispute the accuracy of the factual allegations in Plaintiff's  
16 complaint that give rise to Plaintiff's claim for copyright infringement, but denies any fault or liability  
17 related thereto.

18 5. Defendant is PERMANENTLY ENJOINED from directly, contributorily or indirectly  
19 infringing Plaintiff's rights in its motion picture, including without limitation by using the Internet to  
20 reproduce or copy Plaintiff's motion picture, to distribute Plaintiff's motion picture, or to make  
21 Plaintiff's motion picture available for distribution to the public, except pursuant to a lawful written  
22 license from Plaintiff.

23 6. To the extent that any such material exists, Defendant is directed to destroy all  
24 unauthorized copies of Plaintiff's motion picture in Defendant's possession or subject to Defendant's  
25 control.  
26



7. This case is dismissed with prejudice claims pursuant to the terms of the parties' Confidential Settlement Agreement.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

Honorable Richard A. Jones

RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of October, 2014.

s/ David A. Lowe, WSBA No. 24,453

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